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April 6, 2022

VIA ECF

Hon. John P. Cronan, U.S.D.J.
U.S.D.C. for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

The request is granted. Defendant shall file the pre-motion letter by April 13, 2022, and Plaintiff shall file the response by April 20, 2022.

SO ORDERED.
Date: April 7, 2022
New York, New York


JOHN P. CRONAN
United States District Judge

Re: *Yensy Contreras v. Anaheim Ducks Hockey Club, LLC*
Case No. 1:21-cv-09447-JPC

Dear Judge Cronan:

We represent defendant Anaheim Ducks Hockey Club, LLC (“Defendant”) in the above-referenced action. Pursuant to Rule 3(B) of Your Honor’s Individual Rules and Practices in Civil Cases, we write, with the consent of counsel for Plaintiff, to respectfully request an additional extension of time for Defendant to file its pre-motion letters regarding its (i) anticipated motion to compel arbitration, and (ii) motion to stay discovery pending a decision on the motion to compel arbitration, from April 6, 2022 to April 13, 2022. This is the third request to extend these deadlines.

Defendant seeks this extension because it needs additional time to analyze Plaintiff’s usage of the website at issue. Specifically, Plaintiff’s counsel has been working with their client to determine if additional search history information exists. Earlier today, Plaintiff’s counsel provided such additional search history information to Defendant. Since Defendant received this additional search history information today, it needs additional time to review the information provided by Plaintiff and to locate relevant information on its end in connection with such search history.

Accordingly, Defendant respectfully requests that its deadline to file its pre-motion letters regarding its (i) anticipated motion to compel arbitration, and (ii) motion to stay discovery pending a decision on the motion to compel arbitration, be extended from April 6, 2022 to April 13, 2022, and that Plaintiff’s response deadline to such letters be extended from April 13, 2022 to April 20, 2022.

We thank Your Honor for Your consideration of the foregoing.

Respectfully submitted,

/s/ Sean J. Kirby
Sean J. Kirby

cc: All counsel of record via ECF